

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CYNTHIA McGRATH, INDIVIDUALLY, AND AS :
ADMINISTRATRIX AD PROSEQUENDUM OF THE :
ESTATE OF MEGAN K. WRIGHT, DECEASED, AND :
AS GENERAL ADMINISTRATRIX OF THE ESTATE :
OF MEGAN K. WRIGHT, DECEASED, : 07cv11279 (SCR)

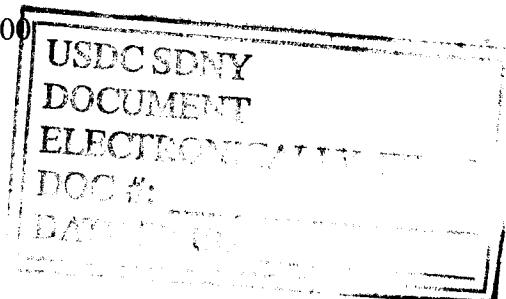
Plaintiff, : : **MOTION TO ADMIT COUNSEL
PRO HAC VICE**

DOMINICAN COLLEGE OF BLAUVELT,
NEW YORK, SISTER MARY EILEEN O'BRIEN,
INDIVIDUALLY AND AS PRESIDENT OF
DOMINICAN COLLEGE, JOHN LENNON,
INDIVIDUALLY AND AS DIRECTOR OF
SECURITY OF DOMINICAN COLLEGE, JOHN
PRESCOTT, INDIVIDUALLY AND AS DEAN OF
STUDENTS OF DOMINICAN COLLEGE, CARLYLE
HICKS, INDIVIDUALLY AND AS DIRECTOR OF
RESIDENT LIFE OF DOMINICAN COLLEGE,
RICHARD FEGINS, JR., KENNETH A. THORNE, JR.,
ISAIAH LYNCH, and TERRELL E. HILL,

Defendants.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York, I, Andrew L. Morrison, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

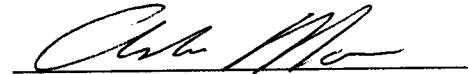
Applicant's Name: Nathan Goldberg
Firm Name: Allred, Maroko & Goldberg
Address: 6300 Wilshire Blvd., Suite 1500
City/State/Zip: Los Angeles, CA 90048
Telephone: (323) 653-6530
Fax: (323) 653-1660
Email Address: NGoldberg@amglaw.com



Nathan Goldberg is a member in good standing of the Bar of the State of California. There are no pending disciplinary proceedings against Nathan Goldberg in any State or Federal court.

Dated: March 31, 2008
New York, New York

Respectfully submitted,



Andrew L. Morrison
SDNY Bar Code: AM-1071
Kirkpatrick & Lockhart Preston
Gates Ellis LLP
599 Lexington Avenue
New York, NY 10022-6030
Tel.: (212) 536-3941
Fax: (212) 536-3901

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

CYNTHIA McGRATH, INDIVIDUALLY, AND AS :
ADMINISTRATRIX AD PROSEQUENDUM OF THE :
ESTATE OF MEGAN K. WRIGHT, DECEASED, AND :
AS GENERAL ADMINISTRATRIX OF THE ESTATE :
OF MEGAN K. WRIGHT, DECEASED, : 07cv11279 (SCR) (GAY)
Plaintiff, : (ECF Case)

- against - :
DOMINICAN COLLEGE OF BLAUVELT, :
NEW YORK, SISTER MARY EILEEN O'BRIEN, :
INDIVIDUALLY AND AS PRESIDENT OF :
DOMINICAN COLLEGE, JOHN LENNON, :
INDIVIDUALLY AND AS DIRECTOR OF :
SECURITY OF DOMINICAN COLLEGE, JOHN :
PRESCOTT, INDIVIDUALLY AND AS DEAN OF :
STUDENTS OF DOMINICAN COLLEGE, CARLYLE :
HICKS, INDIVIDUALLY AND AS DIRECTOR OF :
RESIDENT LIFE OF DOMINICAN COLLEGE, :
RICHARD FEGINS, JR., KENNETH A. THORNE, JR., :
ISAIAH LYNCH, and TERRELL E. HILL, :
Defendants. :
-----X

State of New York)
) ss:
County of New York)

Andrew L. Morrison, being duly sworn, hereby deposes and says as follows:

1. I am a Partner at Kirkpatrick & Lockhart Preston Gates Ellis LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Nathan Goldberg as counsel pro hac vice to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in January of 1988. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Nathan Goldberg since December 2007.

4. Nathan Goldberg is a Partner at Allred, Maroko & Goldberg in Los Angeles, California.

5. I have found Nathan Goldberg to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

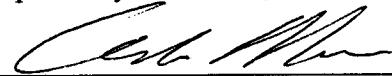
6. Accordingly, I am pleased to move the admission of Nathan Goldberg, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Nathan Goldberg, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Nathan Goldberg, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

New York, New York
Dated: March 31, 2008

Respectfully submitted,



Andrew L. Morrison
SDNY Bar Code: AM-1071
Kirkpatrick & Lockhart Preston
Gates Ellis LLP
599 Lexington Avenue
New York, NY 10022-6030
Tel.: (212) 536-3941
Fax: (212) 536-3901

Sworn to before me this
31st day of March 2008


Notary Public

DEBORAH JEAN CERIA MEYERS
Notary Public, State of New York
No. 31-4831744
Qualified in New York County
Commission Expires September 30, 2008

DEBORAH JEAN CERIA MEYERS
Notary Public, State of New York
No. 31-4831744
Qualified in New York County
Commission Expires September 30, 2008



THE
STATE BAR
OF CALIFORNIA

180 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105-1639
TELEPHONE (415) 538-2000

March 14, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, NATHAN GOLDBERG, #61292 was admitted to the practice of law in this state by the Supreme Court of California on December 20, 1974; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; that the public record states that information has been provided pursuant to Business and Professions Code section 6086.1(c); and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert
Kath Lambert
Custodian of Membership Records

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

CYNTHIA McGRATH, INDIVIDUALLY, AND AS	:	
ADMINISTRATRIX AD PROSEQUENDUM OF THE	:	
ESTATE OF MEGAN K. WRIGHT, DECEASED, AND	:	
AS GENERAL ADMINISTRATRIX OF THE ESTATE	:	
OF MEGAN K. WRIGHT, DECEASED,	:	07cv11279 (SCR)
Plaintiff,		
:		ORDER FOR ADMISSION
- against -		PRO HAC VICE
:		ON WRITTEN MOTION
DOMINICAN COLLEGE OF BLAUVELT,	:	
NEW YORK, SISTER MARY EILEEN O'BRIEN,	:	
INDIVIDUALLY AND AS PRESIDENT OF	:	
DOMINICAN COLLEGE, JOHN LENNON,	:	
INDIVIDUALLY AND AS DIRECTOR OF	:	
SECURITY OF DOMINICAN COLLEGE, JOHN	:	
PREScott, INDIVIDUALLY AND AS DEAN OF	:	
STUDENTS OF DOMINICAN COLLEGE, CARLYLE	:	
HICKS, INDIVIDUALLY AND AS DIRECTOR OF	:	
RESIDENT LIFE OF DOMINICAN COLLEGE,	:	
RICHARD FEGINS, JR., KENNETH A. THORNE, JR.,	:	
ISAIAH LYNCH, and TERRELL E. HILL,	:	
Defendants.		:

-----X

Upon the motion of Andrew L. Morrison, attorney for Plaintiff and said sponsor
attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:	Nathan Goldberg
Firm Name:	Allred, Maroko & Goldberg
Address:	6300 Wilshire Blvd., Suite 1500
City/State/Zip:	Los Angeles, CA 90048
Telephone:	(323) 653-6530
Fax:	(323) 653-1660
Email Address:	NGoldberg@amglaw.com

is admitted to practice pro hac vice as counsel for Plaintiff in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City/State:

Stephen C. Robinson, U.S. District Judge

Andrew L. Morrison (AM-1071)
 Sarah P. Kenney (SK-5642)
 KIRKPATRICK & LOCKHART PRESTON GATES ELLIS LLP
 599 Lexington Avenue
 New York, New York 10022
 212-536-3900
 Attorneys for Plaintiff
 Cynthia McGrath, individually and as
 Administratrix Ad Prosequendum of the Estate
 of Megan Wright, Deceased, and as General
 Administratrix of the Estate of Megan K.
 Wright Deceased

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----X
 CYNTHIA McGRATH, INDIVIDUALLY AND AS :
 ADMINISTRATRIX AD PROSEQUENDUM OF THE : 07 Civ. 11279 (SCR)(GAY)
 ESTATE OF MEGAN K. WRIGHT, DECEASED, AND :
 AS GENERAL ADMINISTRATRIX OF THE ESTATE :
 OF MEGAN K. WRIGHT, DECEASED, :
 Plaintiff, :
 :
 - against - :
 :
 DOMINICAN COLLEGE OF BLAUVELT, : CERTIFICATE OF
 NEW YORK, SISTER MARY EILEEN O'BRIEN, : SERVICE
 INDIVIDUALLY AND AS PRESIDENT OF :
 DOMINICAN COLLEGE, JOHN LENNON, :
 INDIVIDUALLY AND AS DIRECTOR OF :
 SECURITY OF DOMINICAN COLLEGE, JOHN :
 PRESCOTT, INDIVIDUALLY AND AS DEAN OF :
 STUDENTS OF DOMINICAN COLLEGE, CARLYLE :
 HICKS, INDIVIDUALLY AND AS DIRECTOR OF :
 RESIDENT LIFE OF DOMINICAN COLLEGE, :
 RICHARD FEGINS, JR., KENNETH A. THORNE, JR., :
 ISAIAH LYNCH, and TERRELL E. HILL, :
 Defendants. :
 -----X

I, Sarah P. Kenney, hereby certify that on April 1, 2008, I caused the Motion to Admit
 Counsel Pro Hac Vice and Affidavit of Andrew L. Morrison In Support Of Motion To Admit

Counsel Pro Hac Vice, exhibit thereto, and Certificate of Good Standing of Nathan Goldberg, to be served by first class mail, postage prepaid, addressed as follows:

Philip C. Semprevivo, Jr., Esq.
Biedermann, Reif, Hoenig & Ruff
570 Lexington Avenue
New York, New York 10022
Attorneys for Defendants Dominican College of Blauvelt,
New York, Sister Mary Ellen O'Brien, John Lennon,
John Prescott and Carlyle Hicks

Kenneth J. Murphy, Esq.
Samimi & Murphy
616 South Main Street
New City, New York 10956
Attorneys for Defendant Richard Fegins

Richard Willstatter, Esq.
Green & Willstatter
200 Mamaroneck Avenue
Suite 605
White Plains, New York 10601
Attorneys for Defendant Kenneth Thorne, Jr.

Karen Campbell, Esq.
Alan Kaminsky, Esq.
Lewis Brisbois Bisgaard & Smith LLP
199 Water Street
Suite 2500
New York, New York 10038
Attorneys for Defendant Isaiah Lynch

Terrell Hill
32 Halgren Cres.
Haverstraw, New York 10927-1032
Defendant



Sarah P. Kenney